

# **Exhibit D**

Message

**From:** Schlerf, Janis E [JSCHLERF@travelers.com]  
**Sent:** 4/26/2022 4:02:58 PM  
**To:** Meagher, Jeffrey J. [/o=KIRKPATRICK & LOCKHART/ou=KLEXCHANGE/cn=Pittsburgh/cn=Users/cn=meaghejj]  
**CC:** Birsic, Thomas E. [/o=KIRKPATRICK & LOCKHART/ou=KLEXCHANGE/cn=Recipients/cn=birsicte]  
**Subject:** RE: Murphy Oil: Montana Lawsuits

**External Sender:**

Good afternoon,

Thank you for your letter of April 7, 2022 regarding the law firms and experts retained by Murphy Oil in connection with the Montana Lawsuits.

On April 11, 2022, we issued a check in the amount of \$419,721.69, to Murphy Oil for reimbursement of post tender charges with respect to the invoices submitted with your October 20, 2021 letter pertaining to the Hydro Solutions, Chemistry Matters, and Lighthouse invoices. We are in the process of reviewing the law firm invoices and will be responding to your April 7, 2022 letter in the near future.

In the interim, please provide us with a comprehensive status of the litigation as well as budget of the matter.

USF&G continues to reserve all of its rights and defenses. We also reserve all rights with respect to the reasonableness and necessity of the law firm invoices, including, without limitation, staffing and billing rates. Neither this correspondence nor any future correspondence should be deemed as a waiver of any rights and defenses nor as an admission of coverage.

Thank you,  
Janis Schlerf

**Janis E. Schlerf | Senior Account Executive | Strategic Resolution Group**  
Travelers  
111 Schilling Road  
Hunt Valley, Maryland 21031  
W:443.353.2220 F: 443.353.1140



**From:** Meagher, Jeffrey J. <Jeffrey.Meagher@klgates.com>  
**Sent:** Thursday, April 7, 2022 4:49 PM  
**To:** Schlerf, Janis E <JSCHLERF@travelers.com>  
**Cc:** Birsic, Thomas E. <Thomas.Birsic@klgates.com>  
**Subject:** [External] Murphy Oil: Montana Lawsuits

**CAUTION: This email came from outside of Travelers.**

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Ms. Schlerf:

At Tom Birsic's request, please see the attached letter.

Jeff



**Jeffrey J. Meagher**  
Partner  
K&L Gates LLP  
K&L Gates Center  
210 Sixth Avenue  
Pittsburgh, PA 15222-2613  
Phone: 412-355-8359  
Fax: 412-355-6501  
[jeffrey.meagher@klgates.com](mailto:jeffrey.meagher@klgates.com)  
[www.klgates.com](http://www.klgates.com)

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